

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SEBASTIAN CORREA MORALES,)	Hon. Natasha C. Merle
<i>Petitioner,</i>)	
)	Civ. No. 24-7951
-against-)	
)	RESPONDENT’S LIST OF
JULIANA ESCOBAR RESTREPO,)	PROPOSED TRIAL
<i>Respondent.</i>)	EXHIBITS

Juliana Escobar Restrepo (“Respondent”), by and through her attorneys, respectfully submits the following List of Proposed Trial Exhibits:

Number	Respondent’s Exhibits	Stipulation	Objections
1	Verified Complaint for Divorce in New Jersey Matter of <i>Correa Morales v. Escobar Restrepo</i>		
2	Photographs of L.C. in United States		Cumulative; Relevance
3	Letter and Report, Promise Christian Hearsay; Relevance Academy re. L.C.		Hearsay; Relevance; Unclear who the recipient is, as the letter begins with “To Whom It May Concern.”
4	Physician’s Billing Statement re. L.C.		Relevance.
5	New York City Dep’t of Health and Mental Hygiene Document Re. L.C.		Completeness; Relevance.
6	New York Police Dep’t Domestic Incident Report		Hearsay; Relevance
7	U.S. Dep’t of State Request for Entry into Children’s Passport Issuance Alert Program		Relevance.
8	Text Communications Between Parties 10/06/2023		Hearsay; Authentication (improper translation)
9	Text Communications Between Parties 11/15/2023		Hearsay; Authentication (improper translation)

10	Text Communications Between Parties 11/16/2023		Hearsay; Relevance; Authentication (improper translation)
11	Text Communications Between Parties 11/22/2023		Hearsay; Authentication (improper translation)
11-a	Voice-Message of Petitioner to Respondent, 11/22/2023 (audio recording)		Hearsay; Authentication (improper translation)
11-b	Voice-Message of Petitioner to Respondent, 11/22/2023 (audio recording)		Hearsay; Authentication (improper translation)
11-c	Voice-Message of Petitioner to Respondent, 11/22/2023 (audio recording)		Hearsay; Authentication (improper translation)
12	Text Communications Between Parties 11/30/2023		Hearsay; Authentication (improper translation)
12-a	Voice-Message of Petitioner to Respondent, 11/30/2023 (audio recording)		Hearsay; Authentication (improper translation)
12-b	Voice-Message of Petitioner to Respondent, 11/30/2023 (audio recording)		Hearsay; Authentication (improper translation)
13	Text Communications Between Parties 12/07/2023		Hearsay; Authentication (improper translation)
13-a	Voice-Message of Petitioner to Respondent, 12/07/2023 (audio recording)		Hearsay; Relevance; Authentication (improper translation)
14	Text Communications Between Parties 12/15/2023		Hearsay; Relevance;

			Authentication (improper translation)
15	Text Communications Between Parties 01/05/2024		Hearsay; Relevance; Authentication (improper translation)
16	Text Communications Between Parties 01/17/2024		Hearsay
17	Text Communications Between Parties 01/26/2024		Hearsay; Relevance
18	Text Communications Between Parties 02/18/2024		Hearsay; Relevance
19	Text Communications Between Parties 03/01/2024		Hearsay; Relevance
20	Text Communications Between Parties 03/27/2024		Hearsay
21	Text Communications Between Parties 04/07/2024		Hearsay; Relevance
22	Text Communications Between Parties 04/10/2024		Hearsay; Completeness; Relevance
23	Text Communications Between Parties 05/26/2024		Hearsay
24	Text Communications Between Parties 05/28/2024		Hearsay; Relevance
25	Text Communications Between Parties 06/06/2024		Hearsay; Relevance
26	Text Communications Between Parties unknown date June 2024 12:49		Undated Correspondence; Hearsay
27	Text Communications Between Parties 06/20/2024		Hearsay
28	Text Communications Between Parties 06/22/2024		Hearsay; Relevance
29	Text Communications Between Parties 06/26/2024		Hearsay; Relevance
30	Text Communications Between Parties 07/05/2024		Hearsay
31	Text Communications Between Parties 07/12/2024		Hearsay
32	Text Communications Between Parties 07/17 - 07/18/2024		Hearsay; Relevance
33	Text Communications Between Parties 07/22/2024		Hearsay; Completeness

33-a	Voice-Message of Petitioner to Respondent, 07/22/2024 (audio recording)		Hearsay; Authentication (improper translation)
34	Text Communications Between Parties 07/24/2024		Hearsay; Relevance
35	Text Communications Between Parties 07/27 - 07/28/2024		Hearsay
36	Text Communications Between Parties 08/01 - 08/02/2024		Hearsay; Relevance
37	Text Communications Between Parties 08/08/2024		Hearsay; Relevance
38	Text Communications Between Parties 08/20 - 08/21/2024		Hearsay; Relevance
39	Text Communications Between Parties 08/22/2024		Hearsay; Relevance
40	Text Communications Between Parties 09/02/2024		Hearsay; Relevance
41	Text Communications Between Parties 09/20 - 09/21/2024		Hearsay
42	Text Communications Between Parties, 07/01/2024		Hearsay; Relevance
43	Petitioner's Response to Respondent's Interrogatories		
44	Petitioner's Verification of His Response to Respondent's Interrogatories		

Respectfully submitted,

Dated: New York, New York
January 23, 2025

/s/ Edgar Loy Fankbonner
Edgar Loy Fankbonner
Goldberger & Dubin, PC
401 Broadway, Suite 306
New York, New York 10013
Tel.: (212) 431-9380
Mobile: (917) 796-7406
Fax: (212) 966-0588
Email: fankbonner@gmail.com
Attorneys for Respondent